

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: SHAWN D. & MARYANNE M.
O'ROURKE**
Debtor

DEERE & COMPANY
Movant

vs.

**SHAWN D. & MARYANNE M.
O'ROURKE and
Frederick L. Reigle
As the Chapter 12 Trustee,
Respondents**

:
: Chapter 12
:
: Case No.: 14-13370
:
: Honorable Jean K. FitzSimon
:
: Doc. No. ____
:
: Hearing Date: June 27, 2018
:
: Hearing Time: 9:30 a.m.
:

PRAECIPE TO WITHDRAW MOTION FOR RELIEF FROM STAY

Deere & Company ("Deere") hereby withdraws its Motion for Relief from Stay, filed in the above-captioned proceeding on May 29, 2018. Deere further requests the hearing on the above referenced Motion, scheduled for Wednesday, June 27, 2018 at 9:30 a.m. before Judge Jean K. FitzSimon, be removed from the court calendar.

McNEES WALLACE & NURICK LLC

Date: June 27, 2018

By: /s/ Clayton W. Davidson
Clayton W. Davidson
PA Attorney I.D. No. 79139
100 Pine Street - P.O. Box 1166
Harrisburg, PA 17108-1166
Direct Fax: (717)-260-1678
Phone: (717) 232-8000
cdavidson@mcneeslaw.com

Attorneys for Deere and Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies on this day that a true and correct copy of the attached Movant's Praecipe to Withdraw Motion for Relief from Stay was served by first-class United States mail, postage prepaid, addressed as follows:

Shawn D. O'Rourke
993 N. Grange Avenue
Collegeville, PA 19426

Maryanne M. O'Rourke
993 N. Grange Avenue
Collegeville, PA 19426

and by electronic mail through ECF:

Frederick L. Reigle, Chapter 12 Trustee
2901 St. Lawrence Avenue
Suite 101
Reading, PA 19606
flreigle@flreiglepc.com

Daniel T. McGrory
Pizonka, Reilley, Bello & McGrory, P.C.
144 East McKalb Pike, Suite 300
King of Prussia, PA 19406
dmcgrory@pmrbm.com

Date: June 27, 2018

s/ Clayton W. Davidson
Clayton W. Davidson